

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JUNIPER NETWORKS, INC., a)	
Delaware corporation,)	
)	
Plaintiff,)	
)	C.A. No. 11-1258-SLR
v.)	
)	JURY TRIAL DEMANDED
PALO ALTO NETWORKS, INC., a)	
Delaware corporation,)	
)	
Defendant.)	

**DEFENDANT PALO ALTO NETWORKS, INC.'S
PROPOSED VERDICT FORM**

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Pursuant to Federal Rule of Civil Procedure 49 and Local Rule 51.1(c), Defendant Palo Alto Networks, Inc. ("PAN") proposes the verdict form attached hereto as **Exhibit A**. As noted in the Joint Pretrial Order, PAN contends that Juniper's assertion of 65 claims from 7 patents is too many to present to a jury in a 10-day trial. To ensure that the liability trial in this case is manageable and to enhance juror comprehension, it is PAN's position that Juniper should be allowed to present at trial no more than two claims per patent.

PAN reserves the right to update or modify this proposed verdict form following the Court's decisions on the pending summary judgment motions.

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Dated: February 3, 2014
1138175

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)	
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EXHIBIT A

[PROPOSED] VERDICT FORM

We, the jury, unanimously find as follows:

I. INFRINGEMENT

U.S. PATENT NOS. 8,077,723

A. Claim 1

1. Has Juniper proven, by a preponderance of the evidence, that the accused PAN products directly infringe claim 1 of the '723 patent?

*Checking "YES" below indicates a finding for Juniper.
Checking "NO" below indicates a finding for PAN.*

Product	YES (Infringes)	NO (Does Not Infringe)
PA-5000 series firewalls		
PA-4000 series firewalls		
PA-3000 series firewalls		
PA-2000 series firewalls		
PA-500 firewall		
PA-200 firewall		

If all answers are "no," proceed to question 4.

If any answers are "yes," proceed to question 2.

2. Has Juniper proven, by a preponderance of the evidence, that PAN has induced the infringement of claim 1 of the '723 patent with respect to the accused PAN products?

*Checking "YES" below indicates a finding for Juniper.
Checking "NO" below indicated a finding for PAN.*

Product	YES	NO
PA-5000 series firewalls		
PA-4000 series firewalls		
PA-3000 series firewalls		
PA-2000 series firewalls		
PA-500 firewall		
PA-200 firewall		

Proceed to question 3.

3. Has Juniper proven, by a preponderance of the evidence, that PAN has contributed to the infringement of claim 1 of the '723 patent with respect to the accused PAN products?

*Checking "YES" below indicates a finding for Juniper.
Checking "NO" below indicates a finding for PAN.*

Product	YES	NO
PA-5000 series firewalls		
PA-4000 series firewalls		
PA-3000 series firewalls		
PA-2000 series firewalls		
PA-500 firewall		
PA-200 firewall		

Proceed to question 4.

B. Claim 4

[REPEAT FOR OTHER CLAIMS]

U.S. PATENT NOS. 7,779,459

[REPEAT FOR OTHER PATENTS]

II. INVALIDITY**U.S. PATENT NOS. 8,077,723**

1. Has PAN proven, by clear and convincing evidence, that any asserted claim of the '723 patent is invalid due to anticipation?

Checking "YES" below indicates a finding for PAN.

Checking "NO" below indicates a finding for Juniper.

Claim	YES (Invalid)	NO (Not Invalid)
1		
4		
5		
8		
9		
11		
12		

Proceed to question 2.

2. Has PAN proven, by clear and convincing evidence, that any asserted claim of the '723 patent is invalid due to obviousness?

Checking "YES" below indicates a finding for PAN.

Checking "NO" below indicates a finding for Juniper.

Claim	YES (Invalid)	NO (Not invalid)
1		
4		
5		
8		
9		
11		
12		

U.S. PATENT NOS. 7,779,459

[REPEAT FOR OTHER PATENTS]

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CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on February 3, 2014 the within document was electronically filed with the Clerk of the Court using CM/ECF which will send notification to the registered attorney(s) of record that the document has been filed and is available for viewing and downloading.

I further certify that on February 3, 2014, the within document was served on the following persons as indicated:

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